

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GINA WILLIAMS,

S.D. OF N.Y. Civ.No 18-5912 (RJS)

Plaintiff,

-against-

NEW YORK CITY HOUSING AUTHORITY,
CAROLYN JASPER, CESAR GONZALEZ,
MATTHEW HOFFMAN, RODNEY DAVIS, and
THELMA WATKINS

Defendants.

**AMENDED
INITIAL DISCLOSURES
UNDER FRCP 26(a) OF
DEFENDANTS NEW YORK
CITY HOUSING AUTHORITY
CAROLYN JASPER, CESAR
GONZALEZ, MATTHEW
HOFFMAN, RODNEY DAVIS,
and THELMA WATKINS**

Plaintiff Gina Williams hereby submit the following initial disclosures under Federal Rule of Civil Procedure ("FRCP") 26 (a)(1):

Plaintiff likely to have discoverable information that Plaintiff may use to support her allegations in the amended complaint: Emails, Consent Decree signed by Chairperson Stanley Brezenoff June 11, 2018. News articles, Response letters from the New York City Housing Authority, All defendant's personnel employment files, disciplinary records, promotions and demotions including defendants witness Xenia Rivera, Responses from the EEOC, April 24, 2018 New York City Counsel transcript, employees emails, Counseling memorandums issued to plaintiff, Local hearing.

1. Individuals likely to have discoverable information that Plaintiff may use to support her discoverable information.

a. Plaintiff Gina Williams

Documents that has already been submitted to the courts in the

amended complaint and information obtain through discovery from Defendants .

Documents that Plaintiff may use to support her allegations (FRCP)

26(A)(1)(A)(ii).

2. Collective bargaining agreement, Defendant's NYCHA policy, website article from the previous Tenant Association President of Pomonok Houses Monica Corbett.

Plaintiff investigation and search for documents upon which it may rely in its prosecution of this action is continuing. Plaintiff reserve the right to supplement these documents as additional documents are located.

3. A computation of each category of damages (FRCP 26(a)(1)(A)(iii).

Pain, suffering mental anguish, and embarrassment.

4. Plaintiff will review any negotiation and settlement offers or any ward the Jury may grant or the court may deem just. Plaintiff will supplement damage confrontation damages upon discovery and current ongoing discriminatory acts,(FRCP 26(A)(1)(A)(iv).

Dated: Queens, New York
October 30, 2018

Gina Williams
Plaintiff – Pro Se
146-17 182nd Street
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Tel: (347) 886-7802
Ginawms@verizon.net

By: 

Gina Williams

To: KELLY D. MacNEAL
EVP for Legal Affairs and General Counsel
New York City Housing Authority
Nabiha Rahman
Attorney for Defendants
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New York, N.Y. 10007
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GINA WILLIAMS
(List the name(s) of the plaintiff(s)/petitioner(s).)

18 Civ. 5912 (RTS)

- against -

NEW YORK CITY HOUSING
AUTHORITY et al

(List the name(s) of the defendant(s)/respondent(s).)

AFFIRMATION OF SERVICE

I, (print your name) FREDERICK JONES, declare under penalty of perjury that I served a copy of the attached (list the names of the documents you served): INITIAL DISCLOSURES
Letter

upon all other parties in this case by (state how you served the documents, for example hand delivery, mail, overnight express) 250 BROADWAY, NY NY 10007 to the following persons (list the names and addresses of the people you served): NYCHA, CAROLYN JASPER, CESAR GONZALEZ, MATTHEW HOFFMAN, RODNEY DAVIS, THELMA WATKINS

on (date you served the document(s)) OCTOBER 30, 2018

OCTOBER 30, 2018
Dated

FREDERICK JONES
Signature

107-05 SUTPHIN BLVD Apt 2d
Address

JAMAICA NY 11435
City, State

Zip

Telephone Number 646-552-7940

E-Mail Address